

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	Bankruptcy No. 18-18484-jkf
KATHLEEN CORBETT,	Chapter 13
Debtor,	Related to Doc. No. 14 & 20
CONSUMER PORTFOLIO SERVICES, INC.,	
Movant,	
v.	
KATHLEEN CORBETT, and	
SCOTT WATERMAN, Chapter 13 Trustee,	
Respondents.	

SIX-MONTH STIPULATION
RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Consumer Portfolio Services, Inc. ("Movant"), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtor, Kathleen Corbett, by and through her undersigned counsel, Brad J. Sadek, Esquire, and together file this Six-Month Stipulation Resolving Motion for Relief from the Automatic Stay (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.

2. Movant has a secured interest in Debtor's 2015 Hyundai Sonata, Vin No. 5NPE34AF5FH111436 (the "Vehicle").

3. As of the date of this Stipulation, the Debtor is in default of her post-petition payment obligations to Movant in the amount of \$3,007.25, plus two payments in the amount of \$648.81 for March and April's payments, plus \$350.00 in legal fees and \$181.00 in costs for total of \$4835.87

4. Debtor will cure the remaining post-petition arrears by making monthly payments to Movant in the amount of \$1,454.79 until the post-petition arrears are cured. After the post-petition arrears are cured, Debtor shall timely make all future regular \$684.84 monthly payments to Movant pursuant to the terms of the Contract. The first payment due under this Stipulation will be the payment that comes due on July 1, 2019. The payments and due dates will be as follows:

May 1, 2019	\$1,454.79
June 1, 2019	\$1,454.79
July 1, 2019	\$1,454.79
August 1, 2019	\$1,454.79
September 1, 2019	\$1,454.79
October 1, 2019	\$1,454.79

5. Debtors shall direct the payments to:

CPS Auto Rec Trust 2016 - B
P.O. Box 98768
Phoenix, AZ 85038-0768

Payments must be received by Movant at the above-referenced address on or before the 1st day of each month. Debtor will be in default under the Stipulation in the event that Debtor fails to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtor defaults under this Stipulation, Movant may send Debtor and Debtor's counsel a Notice of Default. Debtor will have ten (10) days from the date of the Notice of Default to cure the default. If default is not cured after the ten days, a Certification of Default will be immediately filed with the Court by the Movant. Debtor will have the opportunity to default and cure on two separate occasions, then, if Debtor defaults a third time, Movant will immediately file a Certification of Default with the Court without having to first send Debtor and Debtor's Counsel a Notice of Default and the Debtor will not have the opportunity to cure the default.

6. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtor shall cure the pre-petition and post-petition arrears within ten (10) days from the date of such conversion. Should Debtor fail to cure said arrears within the ten day period, such failure shall be deemed a default under the terms of this Stipulation Movant may serve a notice of default

and intent to file Certification of Default but Debtor will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

7. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: /s/ Keri P. Ebeck
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Counsel for Consumer Portfolio Services, Inc.

By: /s/ Brad J. Sadek, Esq.
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Counsel for Kathleen Corbett

Dated: April 24, 2019